



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140
FEB - 5 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Alex McGregor
The McGregor Company
401 Airport Road
Colfax, Washington 99111

Re: Request for Information Regarding The McGregor Company facilities.

Dear Mr. McGregor:

The United States Environmental Protection Agency (EPA) is seeking information and documents relating to the relief system design and design basis for the anhydrous ammonia storage tanks at the facilities listed below.

	<u>Facility</u>	<u>Address</u>	<u>City</u>	<u>State</u>
1.	Tammany Retail	32278 Waha Road	Lewiston	ID
2.	Genesee Retail	2045 Genesee-Juliaetta Rd	Genesee	ID
3.	Adams Retail	76931 Mann Road	Adams	OR
4.	Star Mill Retail	33752 Melrose Road	Reubens	ID
5.	Prairie Retail	1899 Powerline Road	Nezperce	ID
6.	Pomeroy Retail	235 Highway 12 East	Pomeroy	WA
7.	Grangeville Retail	38 Frontage Road	Grangeville	ID

Pursuant to the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, you are hereby requested to respond to the Information Request (Enclosure 1).

The enclosed Statement of Certification (Enclosure 2) should be signed by a duly authorized officer or agent and returned with the response to this Information Request.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide complete and truthful responses to this Information Request within thirty (30) days of your receipt of the request, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 113(a)(3) of the CAA. This statute permits EPA to seek the imposition of penalties of up to \$37,500 for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive may be treated as non-compliance with the Information Request. If you believe a question is not applicable to the facility, explain in detail the reason for that belief. Be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(C)(2). A complete copy of all responses should be sent to:

Javier Morales
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101

If you have any questions regarding this request, please contact Javier Morales in the Office of Compliance and Enforcement at (206) 553-1255 or Bob Hartman, Assistant Regional Counsel, at (206) 553-0029.

Sincerely,


Edward J. Kowalski
Director

Enclosures

1. CAA § 112(r) Information Request
2. Statement of Certification

ENCLOSURE 1
CAA § 112(r) Information Request

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request, with the number of the question to which it corresponds. A complete set of all responses should be sent to the following address:

Javier Morales
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101

2. For each question contained herein, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific request herein.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. The information requested must be submitted whether or not you regard part or all of it as a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted.

For information submitted to EPA, any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. § 1905. The manner by which to assert a business confidentiality claim is set forth at 40 C.F.R. § 2.203(b). The information covered by such a claim will be disclosed by EPA only to the extent, and by the procedure set forth in 40 C.F.R. Part 2, Subpart B. Rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. Information subject to a business confidentiality claim may be disclosed by EPA only to the extent set forth in the above-cited regulations. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

B. INFORMATION REQUESTS

Provide the following information for The McGregor Company facilities ("Facility"). Unless otherwise specified, provide all responsive information from the time period from February 1, 2010, to the date of your receipt of this Information Request.

All terms used in this Information Request shall have their ordinary meaning unless such terms are defined in the Clean Air Act or in the regulations at 40 C.F.R. Part 68.

The term “over pressure relief system” shall mean the piping and components such as spring loaded relief valves, rupture disks, control valves and any other devices utilized to safely limit the pressure in the ammonia storage tanks.

Tammany Retail, 32278 Waha Road, Lewiston, ID:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over pressure relief systems.
6. Provide the codes and standards for the design of the manifold utilized with the relief valves on the ammonia storage vessel.
7. Provide the total surface area for each ammonia storage vessel located at this Facility.
8. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
9. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Genesee Retail, 2045 Genesee-Juliaetta Rd, Genesee, ID:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over pressure relief systems.

6. Provide the total surface area for each ammonia storage vessel located at this Facility.
7. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
8. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Adams Retail, 76931 Mann Road, Adams, OR:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and construct the ammonia storage vessel over pressure relief systems.
6. Provide copies of the codes and standards utilized to design and construct the manifold and valving for the ammonia storage vessel relief valves.
7. Provide the total surface area for each ammonia storage vessel located at this Facility.
8. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
9. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Star Mill Retail, 33752 Melrose Road, Reubens, ID:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over

pressure relief systems.

6. Provide the total surface area for each ammonia storage vessel located at this Facility.
7. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
8. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Prairie Retail, 1899 Powerline Road, Nezperce, ID:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over pressure relief systems.
6. Provide the total surface area for each ammonia storage vessel located at this Facility.
7. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
8. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Pomeroy Retail, 235 Highway 12 East, Pomeroy, WA:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over pressure relief systems.

6. Provide the total surface area for each ammonia storage vessel located at this Facility.
7. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
8. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

Grangeville Retail, 38 Frontage Road, Grangeville, ID:

1. Provide installation drawings for the ammonia storage vessel over pressure relief system for the Facility.
2. Provide the manufactures information for the ammonia storage vessel over pressure relief valves for the Facility including the design and operating specifications.
3. Provide the total number of overpressure relief valves on each ammonia storage vessel including the relief capacity of overpressure relief valves.
4. Provide the manufactures information for all valves that are utilized in conjunction with the ammonia storage vessel over pressure relief valves including but not limited to two way valves and/or isolation valves for the Facility.
5. Provide copies of all codes and standards used to design and build the ammonia storage vessel over pressure relief systems.
6. Provide the total surface area for each ammonia storage vessel located at this Facility.
7. Provide copies of the procedures utilized to maintain the on-going mechanical integrity of the over pressure relief system for the anhydrous ammonia storage.
8. Describe in detail any and all modifications that have been made to the over pressure relief system since the ammonia storage vessel has been commissioned.

ENCLOSURE 2

The McGregor Company
Colfax, Washington
CAA Section 114
Information Request

STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to The McGregor Company are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of The McGregor Company under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date